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6 Attorneys for Petitioner  
7 William H. Hawkins, as Trustee of the  
William H. Hawkins Revocable Trust

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

11 William H. Hawkins, as Trustee of the  
William H. Hawkins Revocable Trust,

Petitioner,

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14 | Anthem Holdings (USA), Inc., a  
15 | Delaware corporation, and DOES 1-10,  
inclusive.

## Respondent.

Case No. 2:24-cv-09044-WLH-JPR

**JOINT STIPULATION TO DISMISS  
ACTION WITHOUT PREJUDICE; AND  
[PROPOSED]  
ORDER**

## [PROPOSED]

**ORDER AND STIPULATION TO DISMISS ALL CLAIMS WITH  
PREJUDICE**

Petitioner William H. Hawkins, as Trustee of the William H. Hawkins Revocable Trust (“Petitioner”) and Respondent Anthem Holdings (USA), Inc., a Delaware Corporation (“Respondent”) hereby jointly stipulate that the action be dismissed without prejudice.

8 The parties mutually request that this matter be dismissed by stipulation and  
9 all future hearing dates be vacated. Good cause exists in light of the fact the parties  
10 have entered into a Settlement Agreement and Release resolving this action.

11 Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Counsel for  
12 Plaintiffs and Defendant further stipulate that the claims and causes of action alleged  
13 against Defendants are hereby dismissed WITHOUT PREJUDICE, each of the  
14 parties to pay their own costs of the action.

15 Parties stipulate that this Court shall retain jurisdiction over this matter for  
16 enforcement of the settlement agreement.

## 18 | IT IS SO STIPULATED.

19 | Dated: December 23, 2024

RUSSELL I. GLAZER  
SARA WATAR  
TROYGOULD PC

By: Russell I Glazer  
Russell I Glazer  
Attorneys for Petitioner William H.  
Hawkins, as Trustee of the William H.  
Hawkins Revocable Trust

24 || Dated: December 23, 2024

ASHLEY R. FICKEL  
DYKEMA GOSSETT LLP

By: Christopher

Ashley R. Fickel  
Attorneys for Respondent Anthem Holdings  
(USA), Inc., a Delaware corporation

1 IT IS SO ORDERED.  
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3 DATED: \_\_\_\_\_, \_\_\_\_\_  
4 THE HONORABLE DANIEL S. MURPHY  
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JOINT STIPULATION TO DISMISS ACTION WITH PREJUDICE